

CALIFORNIA CIVIL RIGHTS LAW GROUP

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DEMERIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

V.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive.

Defendants.

Case No. 3:17-cv-06748-WHO

**SUPPLEMENTAL DECLARATION OF
LAWRENCE ORGAN IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

1 I, LAWRENCE A. ORGAN, hereby declare:

2 1. I am an attorney licensed to practice law in the State of California. I am an
3 attorney with the law firm of California Civil Rights Law Group, attorneys of record for
4 Plaintiffs Demetric Di-Az and Owen Diaz in this action. I submit this Supplemental Declaration
5 in support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion for Summary Judgment. I
6 have personal knowledge of the facts stated herein and if called upon to testify, I could and
7 would competently testify thereto, except as to those matters that are stated upon information and
8 belief.

9 2. Attached hereto and marked as Exhibit A are true and correct copies of
10 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000004.
11 Defendant marked this document as "confidential" pursuant to the Protective Order and the
12 document should therefore be sealed pursuant to this Order.

13 3. Attached hereto and marked as Exhibit B is a true and correct copy of various
14 excerpts from the deposition of Plaintiff Owen Diaz. Defendants Tesla, Inc., nextSource, Inc.,
15 and Citistaff Solutions, Inc. marked this document as "confidential" pursuant to the Protective
16 Order and the document should therefore be sealed pursuant to this Order.

17 4. Attached hereto and marked as Exhibit C is a true and correct copy of various
18 excerpts from the deposition of Plaintiff Demetric Di-az. Defendants Tesla, Inc. and Citistaff
19 Solutions, Inc. marked this document as "confidential" pursuant to the Protective Order and the
20 document should therefore be sealed pursuant to this Order.

21 5. Attached hereto and marked as Exhibit D are true and correct copies of
22 documents produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000842
23 to TESLA-0000843. Defendant marked this document as "confidential" pursuant to the
24 Protective Order and the document should therefore be sealed pursuant to this Order.

1 6. Attached hereto and marked as Exhibit E is a true and correct copy of a document
2 produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped CITISTAFF-
3 0000043. Defendant marked this document as “confidential” pursuant to the Protective Order
4 and the document should therefore be sealed pursuant to this Order.

5 7. Attached hereto and marked as Exhibit F is a true and correct copy of a document
6 produced by Defendant West Valley Staffing Group in discovery and Bates-stamped
7 WV000100-WV000102. Defendant marked this document as “confidential” pursuant to the
8 Protective Order and the document should therefore be sealed pursuant to this Order.

9 8. Attached hereto and marked as Exhibit G is a true and correct copy of a document
10 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000510. Defendant
11 marked this document as “confidential” pursuant to the Protective Order and the document
12 should therefore be sealed pursuant to this Order.

13 9. Attached hereto and marked as Exhibit H is a true and correct copy of a document
14 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000511. Defendant
15 marked this document as “confidential” pursuant to the Protective Order and the document
16 should therefore be sealed pursuant to this Order.

17 10. Attached hereto and marked as Exhibit I is a true and correct copy of a document
18 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000314 to TESLA-
19 0000316. Defendant marked this document as “confidential” pursuant to the Protective Order
20 and the document should therefore be sealed pursuant to this Order.

21 11. Attached hereto and marked as Exhibit J is a true and correct copy of a document
22 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA-0000060. Defendant
23 marked this document as “confidential” pursuant to the Protective Order and the document
24 should therefore be sealed pursuant to this Order.

1 12. Attached hereto and marked as Exhibit K is a true and correct copy of a document
2 produced by Defendant Tesla, Inc. in discovery and Bates-stamped TESLA-0000626. Defendant
3 marked this document as “confidential” pursuant to the Protective Order and the document
4 should therefore be sealed pursuant to this Order.

5 13. Attached hereto and marked as Exhibit L is a true and correct copy of a document
6 produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000108. Defendant
7 marked this document as “confidential” pursuant to the Protective Order and the document
8 should therefore be sealed pursuant to this Order.

9 14. Attached hereto and marked as Exhibit M is a true and correct copy of a
10 document produced by Defendant nextSource, Inc. in discovery and Bates-stamped NS000138 to
11 NS0000139. Defendant marked this document as “confidential” pursuant to the Protective Order
12 and the document should therefore be sealed pursuant to this Order.

13 15. Attached hereto and marked as Exhibit N are true and correct copies of
14 documents produced by Defendant Citistaff Solutions, Inc. in discovery and Bates stamped
15 CITISTAFF-0000050 to CITISTAFF-0000055. Defendant marked this document as
16 “confidential” pursuant to the Protective Order and the document should therefore be sealed
17 pursuant to this Order.

18 16. Attached hereto and marked as Exhibit O is a true and correct copy of a document
19 produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000038 to
20 NS000045. Defendant marked this document as “confidential” pursuant to the Protective Order
21 and the document should therefore be sealed pursuant to this Order.

22 17. Attached hereto and marked as Exhibit P is a true and correct copy of various
23 excerpts of the deposition of Lamar Patterson. Defendant Tesla, Inc. marked this document as
24

1 “confidential” pursuant to the Protective Order and the document should therefore be sealed
2 pursuant to this Order.

3 18. Attached hereto and marked as Exhibit Q are true and correct copies of
4 documents produced by Defendant nextSource, Inc. in discovery and Bates stamped NS000095
5 to NS000100. Defendant marked this document as “confidential” pursuant to the Protective
6 Order and the document should therefore be sealed pursuant to this Order.
7

8 19. Attached hereto and marked as Exhibit R are true and correct copies of documents
9 produced by Defendant Tesla, Inc. in discovery and Bates stamped TESLA0001003 to
10 TESLA0001005. Defendant marked this document as “confidential” pursuant to the Protective
11 Order and the document should therefore be sealed pursuant to this Order.
12

13 20. Attached hereto and marked as Exhibit S is a true and correct copy of a document
14 produced in discovery by Defendant Citistaff Solutions, Inc and Bates-stamped CITISTAFF-
15 0000001. Defendant marked this document as “confidential” pursuant to the Protective Order
16 and the document should therefore be sealed pursuant to this Order.
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19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct. Executed on November 19, 2019 in San Anselmo, California.
21
22

23 DATED: November 19, 2019

24 By: /s Lawrence Organ
25 Lawrence A. Organ, Esq.
26 Navruz Avloni, Esq.
27 J. Bernard Alexander, Esq.
28 Attorneys for Plaintiffs
DEMETRIC DI-AZ AND OWEN DIAZ